

7.0 CONCLUSIONS AND RECOMMENDATIONS

7.1 SUMMARY OF THE STAFF'S ENVIRONMENTAL ANALYSIS

Our review of the information provided by NBP and further developed from data requests; field investigations; scoping; literature research; alternatives analysis; and contacts with Federal, Tribal, state, and local agencies, and individual members of the public indicates that the proposed project would result in limited adverse environmental impact. We have concluded that if the project is constructed and operated in accordance with NBP's proposed mitigation and our additional mitigation recommendations, it would be an environmentally acceptable action. Although many factors were considered in our determination, the principal reasons are:

- most of the impact from the project would occur during construction of the project and be temporary or short term;
- about 81 percent of the proposed pipeline route would be in or adjacent to various existing rights-of-way and/or within a designated utility corridor;
- NBP would implement its CM&R Plan to protect natural resources during construction and operation of the project;
- use of the directional drill method would avoid disturbances to the bed and banks of the Colorado River and the All American Canal, the only major waterbodies crossed by the project;
- the appropriate consultations with the FWS, the SHPOs, the BLM, the BOR, and the ACHP, if required, and any appropriate compliance actions resulting from these consultations, would be completed before NBP would be allowed to begin construction in any given area; and
- an environmental inspection and mitigation monitoring program would ensure compliance with all mitigation measures that become conditions of certification.

In addition, we developed specific mitigation measures that we believe would further reduce the environmental impact that would otherwise result from construction of the project. We are recommending that our mitigation measures be attached as conditions to any authorization issued by the FERC or the CSLC. These recommendations are presented in section 7.5.

Table 7.1-1, at the end of section 7.0, presents a summary of the potential environmental impacts from the project as well as the mitigation that would be applied to reduce any impact to a less than significant level. Additionally, the table lists the agency(ies) responsible for monitoring each of the mitigation requirements. Table 7.1-1 forms the basis for the detailed mitigation monitoring program that would be implemented during construction and operation of the North Baja Pipeline Project.

7.2 ALTERNATIVES CONSIDERED

We considered the No Action or Postponed Action Alternative. We concluded that while the No Action or Postponed Action Alternative would eliminate the environmental impacts identified in this EIS/EIR, NBP's proposed service area would be denied access to the 500 MMcf/d of natural gas NBP

proposes to transport. Consequently, the new and existing power plants would need to use alternative fuels or obtain natural gas from other sources. We did not find any alternative fuels to be feasible or preferable to the proposed project and we determined that the use of an alternative source of natural gas would require the construction of new facilities that would have their own set of specific impacts.

We evaluated alternatives involving the use of other existing pipeline systems. No system alternative was found to be both environmentally preferable to the proposed facilities and able to meet the project's objectives.

We evaluated 11 route alternatives in comparison with the corresponding segment of NBP's proposed route. Four of these alternatives would avoid 18th Avenue, three of these alternatives would place segments of the pipeline within a designated utility corridor, and four alternatives would change the route near the southern terminus (border alternatives). We eliminated the four border alternatives from further consideration and are seeking additional information and comments on the 18th Avenue and designated utility corridor alternatives for consideration in the final EIS/EIR and proposed plan amendment.

We evaluated five route variations in comparison with the corresponding segment of NBP's proposed route. Three of these route variations would avoid the steep terrain in the Palo Verde Mountains foothills and reduce the crossing of the Milpitas Wash SMA. The two remaining route variations would maximize use of existing rights-of-way and increase distance from the Imperial Sand Dunes. We are seeking additional information and comments on these five route variations for consideration in the final EIS/EIR and proposed plan amendment.

We evaluated one alternative site for the Ehrenberg Compressor Station and one alternative site for the Ogilby Meter Station. We determined that neither alternative site offers a clear environmental advantage over the respective proposed site.

7.3 SIGNIFICANT UNAVOIDABLE IMPACTS

Effects on all resources were evaluated to determine any significant impact that would remain so after mitigation. As shown in table 7.1-1, all environmental impacts would be reduced to less than significant levels by proposed or recommended mitigation. The North Baja Pipeline Project would not result in significant unavoidable impacts.

7.4 IRREVERSIBLE/IRRETRIEVABLE COMMITMENT OF RESOURCES; SHORT- AND LONG-TERM USES OF THE ENVIRONMENT

The major nonrenewable resources that would be consumed by the proposed project are fossil fuels used to power construction vehicles and, over the life of the project, the pipeline itself (the compressor station would be natural-gas powered). Theoretically, the pipeline components could be reclaimed at the end of the pipeline's operational life. However, there would be a number of irretrievable resources committed to the proposal if the necessary authorizations are granted. The primary resources irretrievably lost for the short term would include soils (resulting from increased erosion of disturbed areas), crop production (lost or reduced for a portion of one season), land use (aboveground facilities would replace agricultural and open lands for the life of the project), and wildlife habitat (lost during construction). The loss of cultural resources also would be an irretrievable loss, if allowed to occur.

As discussed in section 5.12, the proposed project has been designed to meet or exceed all safety requirements, and the potential for irreversible damage during operation is slight.

The proposed project would transport significant volumes of natural gas to customers in southern California and Mexico. If approved, a substantial resource that presently lies idle would become part of the infrastructure available for use by future generations. And finally, its operation would be consistent with Federal policies encouraging competitive natural gas transportation services. For these reasons, we believe that the limited irreversible and irretrievable resource commitments are acceptable.

7.5 FERC AND CSLC STAFF'S RECOMMENDED MITIGATION

If the FERC and the CSLC approve the North Baja Pipeline Project, we recommend that the following measures be included as specific conditions of the Certificate/permit to further mitigate the environmental impact associated with the construction and operation of the proposed project:

1. North Baja Pipeline, LLC (NBP) shall follow the construction procedures and mitigation measures described in its application, supplemental filings (including responses to staff data requests), and as identified in the environmental impact statement/environmental impact report (EIS/EIR), unless modified by this Order. NBP must:
 - a. request any modification to these procedures, measures, or conditions in a filing with the Secretary of the Commission (Secretary);
 - b. justify each modification relative to site-specific conditions;
 - c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and
 - d. receive approval in writing from the Director of the Office of Energy Projects (OEP)**before using that modification.**
2. The Director of OEP has delegation authority to take whatever steps are necessary to ensure the protection of all environmental resources during construction and operation of the project. This authority shall allow:
 - a. the modification of conditions of this Order; and
 - b. the design and implementation of any additional measures deemed necessary (including stop work authority) to assure continued compliance with the intent of the environmental conditions as well as the avoidance or mitigation of adverse environmental impact resulting from project construction and operation.
3. **Prior to any construction**, NBP shall file an affirmative statement with the Secretary, certified by a senior company official, that all company personnel, environmental inspectors (EIs), and contractor personnel will be informed of the EI's authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs **before** becoming involved with construction and restoration activities.
4. The authorized facility locations shall be as shown in the EIS/EIR, as supplemented by filed alignment sheets and shall include the staff's recommended facility locations. **As soon as they are available, and before the start of construction**, NBP shall file with the Secretary revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by this Order. All requests for modifications of environmental conditions of this Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.

NBP's exercise of eminent domain authority granted under Natural Gas Act (NGA) section 7(h) in any condemnation proceedings related to this Order must be consistent with these authorized facilities and locations. NBP's right of eminent domain granted under NGA section 7(h) does not authorize it to increase the size of its natural gas pipeline to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.

5. NBP shall file with the Secretary detailed alignment maps/sheets and aerial photographs at a scale not smaller than 1:6,000 identifying all route realignments or facility relocations, and staging areas, pipe storage yards, new access roads, and other areas that will be used or disturbed and have not been previously identified in filings with the Secretary. Approval for each of these areas must be explicitly requested in writing. For each area, the request must include a description of the existing land use/cover type, documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas shall be clearly identified on the maps/sheets/aerial photographs. Each area must be approved in writing by the Director of OEP **before construction** in or near that area.

This requirement does not apply to route variations recommended herein or minor field realignments per landowner needs and requirements that do not affect other landowners or sensitive environmental areas such as wetlands.

Examples of alterations requiring approval include all route realignments and facility location changes resulting from:

- a. implementation of cultural resources mitigation measures;
- b. implementation of endangered, threatened, or special concern species mitigation measures;
- c. recommendations by state regulatory authorities; and
- d. agreements with individual landowners that affect other landowners or could affect sensitive environmental areas.

6. **Within 60 days of the acceptance of this certificate and before construction** begins NBP shall file an initial Implementation Plan with the Secretary for the review and written approval by the Director of OEP describing how NBP will implement the mitigation measures required by this Order. NBP must file revisions to the plan as schedules change. The plan shall identify:

- a. how NBP will incorporate these requirements into the contract bid documents, construction contracts (especially penalty clauses and specifications), and construction drawings so that the mitigation required at each site is clear to onsite construction and inspection personnel;
- b. the number of EIs assigned per spread, and how the company will ensure that sufficient personnel are available to implement the environmental mitigation;
- c. company personnel, including EIs and contractors, who will receive copies of the appropriate material;
- d. what training and instructions NBP will give to all personnel involved with construction and restoration (initial and refresher training as the project progresses and personnel change), with the opportunity for OEP staff to participate in the training session(s);
- e. the company personnel (if known) and specific portion of NBP's organization having responsibility for compliance;

- f. the procedures (including use of contract penalties) NBP will follow if noncompliance occurs; and
 - g. for each discrete facility, a Gantt or PERT chart (or similar project scheduling diagram), and dates for:
 - i. the completion of all required surveys and reports;
 - ii. the mitigation training of onsite personnel;
 - iii. the start of construction; and
 - iv. the start and completion of restoration.
- 7. NBP shall file updated status reports with the Secretary on a **weekly** basis **until** all construction-related activities, including restoration, are complete. On request, these status reports will also be provided to other Federal and state agencies with permitting responsibilities. Status reports shall include:
 - a. the current construction status of each spread, work planned for the following reporting period, and any schedule changes for stream crossings or work in other environmentally sensitive areas;
 - b. a listing of all problems encountered and each instance of noncompliance observed by the EI(s) during the reporting period (both for the conditions imposed by the Federal Energy Regulatory Commission (FERC) and any environmental conditions/permit requirements imposed by other Federal, state, or local agencies);
 - c. corrective actions implemented in response to all instances of noncompliance, and their cost;
 - d. the effectiveness of all corrective actions implemented;
 - e. a description of any landowner/resident complaints which may relate to compliance with the requirements of this Order, and the measures taken to satisfy their concerns; and
 - f. copies of any correspondence received by NBP from other Federal, state, or local permitting agencies concerning instances of noncompliance, and NBP's response.
- 8. NBP must receive written authorization from the Director of OEP **before commencing service from the project**. Such authorization will only be granted following a determination that rehabilitation and restoration of the right-of-way is proceeding satisfactorily.
- 9. **Within 30 days of placing the certificated facilities in service**, NBP shall file an affirmative statement with the Secretary, certified by a senior company official:
 - a. that the facilities have been constructed in compliance with all applicable conditions, and that continuing activities will be consistent with all applicable conditions; or
 - b. identifying which of the certificate conditions NBP has complied with or will comply with. This statement shall also identify any areas along the right-of-way where compliance measures were not properly implemented, if not previously identified in filed status reports, and the reason for noncompliance.
- 10. NBP shall file with the FERC and the California State Lands Commission (CSLC) for the review and written approval by the Director of OEP before construction a Liquefaction Hazard Evaluation and Mitigation Study (LHEM Study). The LHEM Study shall be performed in a manner consistent with California Division of Mines and Geology Special Publication 117, *Guidelines for Evaluation and Mitigation of Seismic Hazards in California, Chapter 6, Analysis and Mitigation of Liquefaction*

Hazards and identify mitigation measures proposed to eliminate or reduce potential risk. At a minimum, the areas evaluated in the LHEM Study shall include:

- a. the Ehrenberg Compressor Station site to the Rannells Trap site (mileposts 0.0 to 11.7);
b. the vicinity of the All American Canal (milepost 79.8); and
c. any other location where liquefaction hazard potential exists (*i.e.*, sandy and/or silty soils of low plasticity where groundwater is within 50 feet of the surface).
11. NBP shall file with the FERC and the CSLC for the review and written approval of the Director of OEP before construction a Paleontological Resource Mitigation and Monitoring Plan (PRMM Plan) and the Bureau of Land Management's (BLM) comments on the plan. At a minimum, the PRMM Plan shall include:
 - a. a strategy for avoidance;
 - b. mitigation measures, including procedures for scientific removal, that would be implemented to protect and preserve any known fossil sites along the right-of-way or any sites discovered during construction;
 - c. provisions for the preparation and curation of any fossil collections; and
 - d. a protocol for the preparation of a final report based on the data recovery.
12. NBP shall file with the FERC and the CSLC before construction a revised Construction Mitigation and Restoration Plan that incorporates requirements of other jurisdictional agencies that are received after the issuance of the EIS/EIR.
13. NBP shall not begin an open-cut crossing of the Colorado River **until**:
 - a. NBP files with the FERC and the CSLC the specific reasons that the directional drilling technique was not successful;
 - b. NBP files with the FERC and the CSLC a description of the mitigation measures that would minimize the extent and duration of disturbance to special status species and/or their critical habitat in or on the banks of the Colorado River;
 - c. the staff completes formal consultation with the U.S. Fish and Wildlife Service (FWS) and the California Department of Fish and Game (CDFG) has made a consistency determination on the Biological Opinion (BO) pursuant to Section 2080.1 of the California Fish and Game Code;
 - d. NBP has completed and filed with the FERC the results of consultations with the Arizona Department of Game and Fish (ADGF) regarding measures to avoid or minimize impacts on state-listed species in Arizona; and
 - e. NBP has received written notification from the Director of OEP that an open-cut crossing may begin.
14. NBP shall file with the FERC and the CSLC copies of the full annual reports of the desert vegetation monitoring and the experimental seeding and cactus salvage program for the first, second, and fifth year after construction.
15. NBP shall file with the FERC and the CSLC for the review and written approval of the Director of OEP before construction a list of locations where the right-of-way width would be reduced to preserve native trees based on field surveys of the final pipeline construction right-of-way.

16. NBP shall not begin construction activities **until**:
 - a. NBP completes all required species-specific surveys and the FERC and the CSLC receive comments from the FWS and the CDFG regarding the preconstruction survey reports;
 - b. the FERC completes formal consultation with the FWS;
 - c. the CDFG makes a consistency determination on the BO pursuant to Section 2080.1 of the California Fish and Game Code;
 - d. NBP has completed and filed with the FERC the results of consultations with the ADGF regarding measures to avoid or minimize impacts on special status species in Arizona; and
 - e. NBP has received written notification from the Director of OEP that construction or mitigation may begin.
17. NBP shall file with the FERC and the CSLC before construction revised site-specific residential construction plans that include the provision that safety fencing would be installed at the edge of the construction work area for a minimum of 100 feet on both sides of each residence that is within 100 feet of the construction work area.
18. NBP shall file with the FERC and the CSLC for the review and written approval of the Director of OEP before construction a Traffic Management Plan for 18th Avenue prepared in consultation with the County of Riverside Transportation Department. At a minimum, the plan shall include the measures listed in section 5.8.3.2 of the EIS/EIR.
19. NBP shall defer construction and use of its facilities and any staging, storage, or temporary work areas and new or to-be-improved access roads **until**:
 - a. NBP prepares and files with the FERC and the CSLC, and submits to the Arizona and California State Historic Preservation Offices (SHPOs), the BLM, and the Bureau of Reclamation (BOR), as appropriate, any outstanding cultural resources reports, testing and evaluation reports, and necessary treatment plans;
 - b. NBP files with the FERC and the CSLC the comments of the SHPOs, the BLM, and the BOR, as appropriate, on all cultural resources reports and plans submitted for review;
 - c. the Advisory Council on Historic Preservation has been given an opportunity to comment if required; and
 - d. the Director of OEP reviews and approves all cultural resources reports and plans, and notifies NBP in writing that construction may proceed.

All material filed with the FERC and the CSLC containing **location, character, and ownership information** about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering. "**CONTAINS PRIVILEGED INFORMATION - DO NOT RELEASE.**"

20. NBP shall conduct a noise survey to verify that the noise from the Ehrenberg Compressor Station operated at full load does not exceed a day-night equivalent sound level (L_{dn}) of 55 decibels of the A-weighted scale (dBA) at any noise-sensitive areas (NSA), and file the results of the noise survey with the FERC and the CSLC **no later than 60 days** after placing the compressor station in service. If the noise attributable to the operation of the compressor station at full load exceeds an L_{dn} of 55 dBA at any nearby NSAs, NBP shall file a report on what changes are needed and shall install additional noise controls to meet that level**within 1 year of the in-service date**. NBP shall confirm compliance with the L_{dn} of 55 dBA requirement by filing a second noise survey with the FERC and the CSLC no later than 60 days after it installs the additional noise controls.

TABLE 7.1-1

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
GEOLOGY					
NBP1	Disturbances to the natural topography along the right-of-way and at aboveground facilities could occur due to trenching and grading activities (section 5.1.1).	Significant (CEQA Class 2)	After completion of construction, NBP would restore topographic contours and drainage conditions as closely as practicable to their preconstruction condition.	Less than significant (CEQA Class 3)	Federal Energy Regulatory Commission (FERC), California State Lands Commission (CSLC), and Bureau of Land Management (BLM) monitors would verify contours are restored to preconstruction grade.
NBP2 ARM1	Geologic hazards such as seismicity, soil liquefaction, subsidence, and landslides could threaten the integrity of the pipeline facilities (section 5.1.1).	Significant (CEQA Class 2)	NBP would construct and test the pipeline facilities to meet U.S. Department of Transportation (DOT) construction and safety standards outlined in 49 Code of Federal Regulations (CFR) Part 192, <i>Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards</i> . NBP would also prepare a Liquefaction Hazard Evaluation and Mitigation Study in a manner consistent with California Division of Mines and Geology Special Publication 117, <i>Guidelines for Evaluation and Mitigation of Seismic Hazards in California, Chapter 6, Analysis and Mitigation of Liquefaction Hazards</i> and identify mitigation measures proposed to eliminate or reduce potential risk.	Less than significant (CEQA Class 3)	NBP certified compliance with DOT construction and safety standards in its application to the FERC. The FERC is responsible for reviewing and providing written approval of the Liquefaction Hazard Evaluation and Mitigation Study.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project					
Mitigation Number a/	Impact	Significance Before Mitigation b/	Mitigation	Significance After Mitigation b/	Monitoring Responsibility
NBP3	Blasting for trench excavation is anticipated in the Palo Verde Mountains between mileposts (MP) 29.7 and 31.5 and potentially in other areas where bedrock is close to the surface. Temporary effects of blasting could include hazards posed by uncontrolled fly-rock, and nuisances caused by noise, increased dust, and venting of gases following blasts (section 5.1.2).	Significant (CEQA Class 2)	All blasting would be conducted in strict compliance with NBP's construction specification for blasting. This specification contains procedures for complying with applicable Federal, state, and local safety and environmental regulations, codes, and standards for the use, storage, and transport of explosives.	Less than significant (CEQA Class 3)	NBP certified compliance with blasting specification requirements in its application to the FERC. FERC, CSLC, and BLM monitors would verify blasting specification is followed.
NBP4 ARM2	Construction activities could directly and indirectly damage, disturb, or result in the loss of paleontological resources (section 5.1.3).	Significant (CEQA Class 2)	Prior to construction, NBP would prepare and file a Paleontological Resource Mitigation and Monitoring Plan. The plan would be prepared in consultation with the BLM and would include: <ul style="list-style-type: none"> • a strategy for avoidance; • mitigation measures, including procedures for scientific removal, that would be implemented to protect and preserve any known fossil sites along the right-of-way or any sites discovered during construction; • provisions for the preparation and curation of any fossil collection; and • a protocol for the preparation of a final report based on the data recovery. 	Less than significant (CEQA Class 3)	The FERC is responsible for reviewing and providing written approval of the Paleontological Resource Mitigation and Monitoring Plan. FERC, CSLC, and BLM monitors would verify plan is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
SOILS					
NBP5 ARM3	Construction of the pipeline and aboveground facilities could expose soils to erosional forces, compact soils, affect soil fertility, cause mixing of soil horizons, and facilitate the dispersal and establishment of weeds. Contamination from spills or leaks of fuels, lubricants, and coolant from construction equipment could also have an impact on soils (section 5.2.1).	Significant (CEQA Class 2)	NBP would mitigate impacts on soils by implementing its Spill Prevention, Containment, and Control Plan for Hazardous Materials and Wastes (SPCC Plan) and Construction Mitigation and Restoration Plan (CM&R Plan) developed in consultation with the BLM and the California Department of Fish and Game (CDFG). Prior to construction, NBP would revise the CM&R Plan to incorporate the requirements of other jurisdictional agencies that are received after the issuance of the environmental impact statement/environmental impact report (EIS/EIR).	Less than significant (CEQA Class 3)	The FERC is responsible for reviewing and providing written approval of the revised CM&R Plan. FERC, CSLC, and BLM monitors would verify SPCC and CM&R Plans are followed. Other responsible agencies would monitor portions of construction to verify SPCC and CM&R Plans are followed.
NBP6	Construction of the pipeline could impact about 51.3 acres of soils with shallow depths to bedrock (including areas where blasting would be required), 29.1 acres of soils with high water erosion potential, and 124.1 acres of soils with high wind erosion potential (section 5.2.2).	Significant (CEQA Class 2)	NBP would mitigate impact on these soils by implementing its CM&R Plan (see NBP5/ARM3).	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify CM&R Plan is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP7	Construction activities could impact irrigation systems within the Palo Verde Valley (section 5.2.2).	Significant (CEQA Class 2)	With the exception of Rannels Drain, irrigation drains and canals would not be affected by construction of the pipeline because they would be crossed either by boring underneath the culverts along 18 th Avenue or by installing the pipeline between the drain culvert and the road.	Less than significant (CEQA Class 3)	FERC and CSLC monitors would verify Part II of the CM&R Plan is followed.
NBP8	Construction of the pipeline could impact about 54.9 acres of soil identified as prime farmland or farmland of statewide importance (section 5.2.2).	Significant (CEQA Class 2)	NBP would mitigate impacts on soils in active farmlands by segregating topsoil before installation of the pipeline and reapplying topsoil over the surface of the right-of-way during restoration as outlined in its CM&R Plan (see NBP5/ARM3).	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify CM&R Plan is followed.
NBP9	Construction could reduce crop productivity in the Palo Verde Valley (section 5.2.2).	Significant (CEQA Class 2)	NBP would develop and implement a crop monitoring program in accordance with Part II of its CM&R Plan (see NBP5/ARM3).	Less than significant (CEQA Class 3)	The FERC and CSLC are responsible for reviewing quarterly activity reports documenting restoration problems and corrective actions taken and monitoring the right-of-way for at least 2 years following construction.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP10	Construction of the Ehrenberg Compressor Station would result in the permanent loss of 12.4 acres of soil identified as prime farmland (section 5.2.2).	Less than significant (CEQA Class 3)	No mitigation is proposed. This loss would equal less than 0.1 percent of the agricultural lands in the Palo Verde Valley.	Less than significant (CEQA Class 3)	No monitoring required.
WATER RESOURCES					
NBP11	Shallow aquifers underlying construction areas could experience changes in overland flow and recharge caused by clearing and grading of the construction right-of-way (see section 5.3.1.1).	Significant (CEQA Class 2)	After completion of construction, NBP would recontour and restore the ground surface to ensure that the original overland flow and recharge patterns are restored.	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify that original overland flow and recharge patterns are restored.
NBP12	Compaction of near-surface soils during construction of the pipeline and aboveground facilities could affect groundwater by reducing the soil's ability to absorb water (section 5.3.1.1).	Significant (CEQA Class 2)	NBP would comply with its soil compaction mitigation described in Part II of its CM&R Plan (see NBP5/ARM3). This includes testing topsoil and subsoil at regular intervals in agricultural and residential areas for compaction and plowing severely compacted agricultural areas.	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify CM&R Plan is followed.
NBP13	Blasting near groundwater wells during construction could cause temporary changes in water level and turbidity and damage the water wells (section 5.3.1.1).	Significant (CEQA Class 2)	No water wells have been identified within 0.5 mile of anticipated blasting locations. All blasting would be conducted in strict compliance with NBP's construction specification for blasting (see NBP3). NBP's use of proper blasting techniques, which would fracture bedrock only to the point necessary for removal, would limit the effect of the blast to a local area above the aquifer in the proximity of the trenchline.	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify blasting specification is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP14	Spills or leaks of hazardous liquids during construction of the pipeline and aboveground facilities could affect groundwater resources (section 5.3.1.1).	Significant (CEQA Class 2)	NBP would comply with its SPCC Plan. This includes avoiding or minimizing potential impacts by restricting the location of refueling activities and storage facilities and by requiring immediate cleanup in the event of a spill or leak. Additionally, the SPCC Plan identifies emergency response procedures, equipment, and cleanup measures in the event of a spill.	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify SPCC Plan is followed.
NBP15	Trench dewatering during pipeline construction could affect groundwater resources (section 5.3.1.1).	Significant (CEQA Class 2)	NBP would dewater trenches in such a manner that no heavily silt-laden water flows into any waterbody as described in its CM&R Plan (see NBP5/ARM3).	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify CM&R Plan is followed.
NBP16	Water table elevations could be affected by construction activities and the alteration of the natural soil strata could result in new migration pathways for groundwater, particularly in wetlands (section 5.3.1.1).	Significant (CEQA Class 2)	NBP would construct trench breakers between the upland/wetland interface and follow other restoration procedures identified in its CM&R Plan (see NBP5/ARM3).	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify CM&R Plan is followed.
NBP17	Construction activities could impact public and private wells located within 150 feet of the proposed work area (section 5.3.1.2).	Significant (CEQA Class 2)	During initial review, one water well was identified within 150 feet of the construction work area. Before construction, NBP would conduct a field survey to verify the location of this well and any other wells or springs that are identified within 150 feet of the construction work area. With the landowner's permission, NBP would test these water wells before construction to determine baseline flow conditions as a means of determining any potential construction-related impacts. Where impacts are reported by landowners, NBP would conduct post-construction water well tests. If it is determined that construction activities have impaired a well water quality or yield, NBP would either provide bottled water for drinking and arrange for an alternate source of water (such as water truck) for other household uses, temporarily relocate the landowner until the water supply is restored, or compensate the landowner for losses.	Less than significant (CEQA Class 3)	NBP certified compliance with the mitigation requirements in its application to the FERC. FERC and CSLC monitors would verify mitigation is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project					
Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP18	Construction activities could affect waterbodies through modification of aquatic habitat, increased sedimentation, increased turbidity, decreased dissolved oxygen concentrations, stream warming, releases of chemical and nutrient pollutants from sediments, or introduction of chemical contamination such as fuels and lubricants (section 5.3.1.2).	Significant (CEQA Class 2)	NBP would install the pipeline across all of the flowing waterbodies crossed by the project using the directional drill or bore method or install the pipeline between drain culverts and 18 th Avenue, with one exception (Ranells Drain). Construction and restoration at Ranells Drain would be done in accordance with Part III of NBP's CM&R Plan (see NBP5/ARM3).	Less than significant (CEQA Class 3)	FERC and CSLC monitors would verify Part II of the CM&R Plan is followed.
NBP19	The primary impact that could occur as a result of directionally drilling the Colorado River and All American Canal is an inadvertent release of drilling mud directly or indirectly into the waterbody. Drilling mud could leak through previously unidentified fractures in the material underlying the riverbed, in the area of the mud pits or tanks, or along the path of the drill due to unfavorable ground conditions (section 5.3.2.2).	Significant (CEQA Class 2)	NBP developed a Horizontal Directional Drill Plan (Part IV of the CM&R Plan) that describes how drilling operations would be conducted and monitored to minimize the potential for inadvertent releases or failure. It also includes procedures for cleanup of drilling mud releases and for sealing the hole if a drill cannot be completed.	Less than significant (CEQA Class 3)	FERC and CSLC monitors would verify Part IV of the CM&R Plan is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP20 ARM4	Construction could reduce water quality and impact habitats associated with the bed and banks of the Colorado River and the All American Canal if the proposed directional drills fail (5.3.2.2).	Significant (CEQA Class 1)	<p>NBP developed and filed a contingency plan for crossing the Colorado River and All American Canal using the open-cut technique. NBP would adhere to the measures of the FERC's Wetland and Waterbody Construction and Mitigation Procedures (FERC Procedures) to minimize the impact of an open-cut crossing. Prior to implementing its contingency plan for an open-cut crossing of the Colorado River, NBP would file with the FERC and the CSLC:</p> <ul style="list-style-type: none"> • the specific reasons that the directional drilling technique was not successful; and • a description of the mitigation measures that would minimize the extent and duration of disturbance to special status species and/or their critical habitat on the banks of the Colorado River. <p>NBP could not begin an open-cut crossing until:</p> <ul style="list-style-type: none"> • the staff completes formal consultation with the U.S. Fish and Wildlife Service (FWS) and the CDFG has made a consistency determination on the Biological Opinion (BO) pursuant to Section 2080.1 of the California Fish and Game Code; • NBP has completed and filed with the FERC the results of consultations with the Arizona Department of Game and Fish (ADGF) regarding measures to avoid or minimize impacts on state-listed species in Arizona; and • NBP has received written notification from the Director of the Office of Energy Projects (OEP) that an open-cut crossing may begin. 	Less than significant (CEQA Class 3)	The FERC is responsible for reviewing and providing written approval of an open-cut crossing mitigation plan. FERC and CSLC monitors would verify the mitigation plan and permits are followed. FERC and CSLC monitors would verify FERC Procedures are followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP21	Construction could impact the streambed and associated wildlife habitats of the Colorado River and 579 dry washes crossed by the proposed pipeline route (section 5.3.2.4).	Significant (CEQA Class 2)	<p>NBP would obtain a Streambed Alteration Agreement from the CDFG and follow its CM&R Plan developed in consultation with the CDFG (see NBP5/ARM3).</p> <p>NBP would provide offsite, compensatory mitigation for disturbances to wildlife habitats located between the banks of dry desert washes. Prior to implementation of CDFG-required mitigation measures, NBP would consult with the CDFG regarding compensatory mitigation requirements for habitat losses.</p>	Less than significant (CEQA Class 3)	<p>The FERC is responsible for reviewing and providing written approval of CDFG-required mitigation requirements.</p> <p>FERC, CSLC, and BLM monitors would verify mitigation requirements are followed.</p>
WETLANDS					
NBP22	Construction could disturb a total of 3.5 acres of wetland area. Impacts could include alteration of wetland vegetation, temporary changes to wetland hydrology and water quality, temporary lowering of the water table, and increased turbidity during trenching and restoration activities (section 5.4.1).	Significant (CEQA Class 2)	<p>NBP would adhere to its CM&R Plan (see NBP5/ARM3), comply with the COE's Section 404 permit conditions, and obtain appropriate state-issued Section 401 water quality certifications or waivers.</p>	Less than significant (CEQA Class 3)	<p>FERC, CSLC, and BLM monitors would verify CM&R Plan and conditions of permits are followed.</p>

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project					
Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
VEGETATION					
NBP23 ARM5	The primary impact of the project on vegetation would be the cutting, clearing, and/or removal of existing vegetation within the construction work area. The removal of desert vegetation could have longer-term impacts than in agricultural areas where vegetation reestablishes quickly (section 5.5.1).	Significant (CEQA Class 2)	NBP proposes to allow natural revegetation of the construction right-of-way after construction since active revegetation efforts such as seeding and active planting generally fail in the desert due to the arid environment. To aid in the natural revegetation process, NBP would stockpile topsoil in graded areas to conserve the existing seedbank. During restoration, the topsoil would be respread evenly across the surface of the right-of-way. In areas where grading is not required but vegetation must be removed, NBP would leave the underground roots of woody plants intact. Vegetation that must be cut would be stored at the edge of the right-of-way and respread over the right-of-way during or after final grading to provide a mulch to trap seeds, shade seedlings, and conserve water for the revegetation of the right-of-way. In areas where topsoil is removed, this material would be spread with the topsoil. Lastly, during final restoration, NBP would imprint disturbed soils with equipment (e.g., sheepfoot) that would create indentations to catch seeds and water, aiding in the natural revegetation of the construction right-of-way.	Less than significant (CEQA Class 3)	The FERC, CSLC, and BLM monitors would verify CM&R Plan and additional mitigation measures are followed. The FERC, CSLC, and BLM are responsible for monitoring and reviewing annual reports documenting results of desert vegetation monitoring for at least 5 years following construction.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP23 ARM5 (cont'd)			NBP would implement an experimental program to assess the effectiveness of natural revegetation versus supplemental seeding and cactus salvage in desert areas. NBP would annually monitor areas of desert vegetation disturbed by construction for 5 years after construction is completed. Results would be provided in full annual reports to the BLM for the first, second, and fifth years after construction. Data from annual surveys would be provided to the BLM for the third and fourth years. NBP would also file with the FERC and CSLC copies of the full annual reports of the desert vegetation monitoring and the experimental seeding and cactus salvage programs for the first, second, and fifth year after construction.		The FERC is responsible for reviewing and providing written approval of the list of locations where NBP would reduce the width of the construction right-of-way to preserve native trees.
NBP24 ARM6	Construction could reduce wildlife habitat and diversity by removing desert wash woodlands (section 5.5.2).	Significant (CEQA Class 2)	NBP would minimize tree clearing in desert wash woodlands by reducing the width of the construction right-of-way from 80 feet to 50 feet. Prior to construction, NBP would develop a list of locations where it would reduce the width of the construction right-of-way to preserve native trees.	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify mitigation is followed.
NBP25	Removal of existing vegetation and the disturbances of soils during construction could create optimal conditions for the invasion and establishment of exotic-nuisance species (section 5.5.2).	Significant (CEQA Class 2)	NBP developed a CM&R Plan that includes measures that would minimize the spread of noxious weeds from non-native to native plant communities (see NBP5/ARM3). NBP proposes the following mitigation measures to minimize the spread of noxious weeds from non-native to native plant communities:	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify CM&R Plan and additional mitigation measures are followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP25 (cont'd)			<ul style="list-style-type: none"> • In accordance with Executive Order 13112, the construction area within lands administered by the BLM would be surveyed by a qualified noxious weed authority that would identify all noxious weeds present and provide a list to the authorized office. A determination would be made by the authorized officer of any noxious weeds that require flagging for treatment prior to construction. Treatment would be according to instruction of the authorized officer. Any use of herbicides in California would be handled by properly licensed county agricultural agents. • Prior to construction, populations of plants listed as invasive exotics by the California Exotic Plant Pest Council in its most recent invasive plant List A (List-1 and A-2) and Red Alert list, as well as any other species listed on the BLM National List of Invasive Weed Species of Concern already existing in native desert habitat where construction is planned, would be identified on the ground and on maps through a preconstruction survey. This would establish a baseline from which to locate equipment washdown stations as well as to evaluate post-construction monitoring surveys. • Disposal of soil and plant materials from non-native areas would not be allowed in native areas. That is, no disposal or transfer of excess spoils or plant materials from non-native areas would be allowed into native cover type areas. 		

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project					
Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP25 (cont'd)			<ul style="list-style-type: none"> All construction equipment would be washed prior to entering the construction area to prevent the spread of invasive weeds from other areas. Clearing and grading equipment would be washed down with high-pressure water prior to moving from infested areas to non-infested areas. Construction personnel would be educated on weed identification and the importance of controlling and preventing the spread of invasive non-native species infestations. Gravel and/or fill material to be placed in relatively weed-free areas would come from weed-free sources. Certified weed-free hay bales would be used. Post-construction monitoring and treatment of invasive weeds would be implemented in accordance with the CM&R Plan. <p>Additionally, NBP proposes to conduct surveys for non-native plant species after construction is complete. The results of these surveys would be compared to the preconstruction surveys to determine locations of weed infestations attributable to the project. NBP would conduct these surveys and implement control measures (e.g., herbicide application, pulling by hand) twice a year for 2 years after construction is complete. NBP would also implement weed control measures as part of routine maintenance and operation of the pipeline. NBP would include the results of its weed control program with the reports of its general desert vegetation monitoring (see NBP23/ARM5).</p>		FERC, CSLC, and BLM monitors would verify mitigation measures and the CM&R Plan are followed.
WILDLIFE AND AQUATIC RESOURCES					
NBP26	Construction and operation of the pipeline could directly impact wildlife through disturbance, displacement, mortality, and alterations of available habitats (section 5.6.1.1).	Significant (CEQA Class 2)	NBP would implement conservation measures for special status species that would also serve to avoid, minimize, or compensate for impacts on general wildlife and their habitats (see NBP34). NBP would also implement measures identified in its CM&R Plan to avoid or minimize impacts on wildlife habitats as well as facilitate the recovery of native vegetation communities (see NBP5/ARM3).	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify mitigation measures and the CM&R Plan are followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP27	Construction of the Ehrenberg Compressor Station, Rannells Trap, and the Ogilby Meter Station would permanently replace existing wildlife habitats (section 5.6.1.1).	Less than significant (CEQA Class 3)	No mitigation is proposed.	Less than significant (CEQA Class 3)	No monitoring required.
NBP28	An indirect impact of the project could be the increased level of human-wildlife interaction by creating a new right-of-way that could add to the existing matrix of open desert, jeep trails, dry washes, and cleared rights-of-way currently attracting off-highway vehicle (OHV) users (section 5.6.1.1).	Significant (CEQA Class 2)	Impact would be somewhat lessened because about 63 percent of the pipeline route is in or adjacent to existing rights-of-way. In addition, NBP has stated that it has no plans to maintain an improved permanent right-of-way for operation and maintenance of the pipeline facilities. NBP would work with the BLM to identify areas where blocking the right-of-way from OHV use would be appropriate and practical.	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify mitigation is followed.
NBP29	Some impact on migratory birds could result from habitat loss associated with construction of the project (section 5.6.1.2).	Significant (CEQA Class 2)	Mitigation measures described for vegetation communities (see NBP23/ARM5 and NBP24/ARM6) would also reduce the duration of impacts on these species.	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify mitigation is followed.
NBP30	Construction-related activities could directly and indirectly impact wildlife in managed and sensitive biological resource areas such as the Cibola National Wildlife Refuge (NWR), Milpitas Wash Special Management Area (SMA), and two landscape-scale conservation sites identified by The Nature Conservancy (section 5.6.1.2).	Significant (CEQA Class 2)	NBP proposes a number of conservation measures to protect wildlife and special status plants (see NBP34 to 41 and ARM7) that would mitigate impact on wildlife in these managed and sensitive biological resource areas.	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify mitigation is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project					
Mitigation Number a/	Impact	Significance Before Mitigation b/	Mitigation	Significance After Mitigation b/	Monitoring Responsibility
NBP31	Water withdrawal associated with hydrostatic testing activities could entrain fish eggs and juvenile fish (section 5.6.2.1).	Significant (CEQA Class 2)	NBP would cover the water intake with an adequately sized mesh screen to reduce the potential for fish and fish egg entrainment.	Less than significant (CEQA Class 3)	FERC and CSLC monitors would verify mitigation is followed.
NBP32	A chemical or fuel spill in or near a waterbody could release contaminants, which could affect fish directly or indirectly through changes in food sources or by contaminating the water resources (section 5.6.2.1).	Significant (CEQA Class 2)	NBP would adhere to its CM&R (see NBP5/ARM3) and SPCC Plans to reduce the potential of a spill and decrease the response time for control and cleanup of a spill, should one occur.	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify CM&R and SPCC Plans are followed.
NBP33	Several special status fish species could be affected by an open-cut crossing of the Colorado River (section 5.6.2.1).	Significant (CEQA Class 1)	See NBP20/ARM4.	Less than significant (CEQA Class 3)	The FERC is responsible for reviewing and providing written approval of an open-cut crossing mitigation plan.
					FERC and CSLC monitors would verify the mitigation plan is followed.
					FERC and CSLC monitors would verify FERC Procedures are followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
SPECIAL STATUS SPECIES		Significant (CEQA Class 2)		Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify mitigation is followed.
NBP34	Special status plants in the pipeline right-of-way could be lost when the right-of-way is cleared, and special status animals could be affected by the temporary loss of habitat during construction. Construction of aboveground facilities would result in a permanent loss of habitat. Special status species could also be affected where blasting is required (section 5.7.1).	NBP would implement the following general minimization and conservation measures to reduce the impact of the project on special status species: <ul style="list-style-type: none"> • NBP would develop and implement an environmental training program prior to the start of work. All employees and contractors working in the field would be required to complete an environmental training session before beginning work on the right-of-way. The program would include discussions of the biology, distribution, and ecology of special status species within the geographic area of construction; protection afforded such species under applicable Federal and state laws and regulations; all protection measures that must be followed to protect such species during project activities; penalties for noncompliance; reporting requirements; and the importance of compliance with all protection measures. To ensure proper focus, emphasis would be placed on the specific aspects of compliance applicable to the particular audience's activities on the project. • Employees and contractors would be informed during one or more training sessions that they are not authorized to handle or otherwise move listed species at any time, including while commuting to work sites or at a work site. • NBP would hire and designate at least two environmental inspectors (EI) per construction spread who would be responsible for overseeing project environmental protection measures, including those for special status species. Environmental inspection procedures would be in compliance with the relevant provisions of NBP's CM&R Plan. NBP would also hire and designate at least one qualified biologist who would be responsible for identification of habitat and individuals of special status species and for implementation of all measures calling for a qualified biologist's intervention. The biologist would, if needed, hold the required permits or formal agreements with appropriate Federal and state agencies for the survey or handling of any special status species. 			

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP34 (cont'd)		<ul style="list-style-type: none"> • 	<p>An authorized biologist would conduct a preconstruction survey of each project component located within areas identified during NBP's surveys as listed species habitat no more than 7 days prior to the onset of activities.</p> <ul style="list-style-type: none"> • Project personnel would exercise caution when commuting to the construction area to minimize any chance for the inadvertent injury or mortality of species encountered on major roads leading to and from the construction area. NBP's contractors and employees would report all such incidents directly to the EI. • Existing routes of travel and approved access roads would be used to and from construction areas. Cross-country travel by vehicles and equipment would be prohibited. Except on county or state-maintained roads, vehicle and equipment speeds would not exceed 25 miles per hour within potential habitat of a listed species. • Qualified biologists would monitor all work where prior NBP surveys have documented the occurrence of one or more listed species. In conjunction with NBP's EI's, the biologist would have the authority to halt all non-emergency actions that might result in harm to a listed species, and would assist in the overall implementation of protection measures for listed species during project activities. • All trash and food items generated by construction and maintenance activities would be promptly contained and regularly removed from the project site to reduce the attractiveness of the area to common ravens and other desert predators. • Firearms and domestic pets would be prohibited from work sites. • Employees and contractors would look under vehicles and equipment for the presence of special status species prior to movement. If a special status species is observed, no vehicles or equipment would be moved until the animal has left voluntarily or is removed by a biologist authorized to do so. 	

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP34 (cont'd)			<ul style="list-style-type: none"> • Pipeline construction activities between dusk and dawn would be limited to emergencies only (<i>i.e.</i>, issues involving human health and safety) with the exception of the directional drill operations at the Colorado River and the All American Canal. • Open pipeline trenches, auger holes, or other excavations that could entrap wildlife would be inspected by an authorized biologist a minimum of three times per day, and immediately prior to backfilling. In habitats supporting special status species, pipe segments would be capped or taped closed each night. Such pipe segments would be inspected regularly before sealing. For open trenches, earthen escape ramps would be maintained at appropriate intervals. Other excavations that remain open overnight would be covered or ramped to prevent entrapment of wildlife. • If a listed species is located during construction, and a contingency for avoidance, removal, or transplant has not been approved by the FWS or appropriate agency, NBP would not proceed with project activity in that location until specific consultation with the FERC, the FWS, the BLM, and/or other appropriate agency is completed. • All encounters with listed species would be reported to the biologist, who would record the following information: <ul style="list-style-type: none"> a. species name; b. location (narrative and maps) and dates of observations; c. general condition and health, including injuries and state of healing; d. diagnostic markings, including identification numbers or markers; and locations moved from and to. e. Upon locating a dead or injured listed species, NBP would notify the FWS and appropriate state wildlife agency. Written notification would be made within 15 days of the date and time of the finding or incident (if known) and would include: location of the carcass, a photograph, cause of death (if known), and other pertinent information. 		

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project					
Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP34 (cont'd)			<ul style="list-style-type: none"> • The pipeline construction right-of-way would be limited to 80 feet in width, with the exception of authorized extra workspace areas. The construction right-of-way would be clearly staked and flagged in advance of construction. The construction area includes approved work areas for the pipeline, compressor and meter stations, the facilities at Rannels Trap, access roads, and staging and pipe storage areas. • Where desert wash woodland tree densities equal or exceed 15 crowns per 500 feet of centerline, NBP would narrow the construction corridor to 50 feet. Areas of this narrower construction width would be uniquely identified in the field, staked, and flagged in advance of construction. • At the conclusion of work, all trenches and holes would be completely filled, surfaces cleaned and smoothed, and each site recontoured to match the original profiles as closely as possible. • All stakes, flagging, and fencing used to delineate and protect any environmental or cultural feature in the construction area would be removed no later than 30 days after construction and restoration are complete. • With the exception of fenced facilities, all materials and equipment would be removed from the area upon completion of work. • Upon completion of project activities, NBP would submit a standardized report to the FERC for distribution to other agencies, including the FWS. The report would document the effectiveness and practicality of the conservation measures, the number of individuals of each species excavated from their burrows or removed from the site, the number of individuals killed or injured, and other pertinent information. The report would also make recommendations for modifying the stipulations in order to enhance the protection of species in the future. The final report would provide the actual acreage disturbed by project activities by habitat type. 		

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project					
Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP35	Noise from construction of the pipeline and the Ehrenberg Compressor Station could indirectly affect southwestern willow flycatchers if they are present during the breeding season. Noise and activity from the operation of the Ehrenberg Compressor Station could indirectly affect the use of nearby habitats by southwestern willow flycatchers (section 5.7.2.1).	Significant (CEQA Class 2)	<p>NBP would minimize the potential for impacts on the southwestern willow flycatcher by implementing the following measures:</p> <ul style="list-style-type: none"> • All southwestern willow flycatcher native habitat would be avoided by adopted construction methods. • NBP has moved the compressor station planned location away from the Colorado River so that all construction and operation would be more than 1,000 feet from potential habitat. In addition, the directional drill rig would be located on the west side of the river more than 1,000 feet from the potential habitat on the eastern shore. • The remaining construction site within 1,000 feet of potential native habitat is the exit site for the directional drill, an area that would experience active construction for several weeks. All work at this site during the period of April 1 to September 15 would limit noise, dust, nighttime lighting, and human presence to the greatest extent feasible. • Dust, nighttime lighting, and human presence would be limited at the Colorado River crossing and the compressor station within 1,000 feet of potential habitat as follows: <ul style="list-style-type: none"> a. When nighttime operations are required for the pullback of the pipe through the bored hole under the river, all work would be conducted behind abatement walls that would control noise and light emissions. These abatement walls would be installed prior to construction regardless of the time of start of construction. b. No night lighting used within 1,000 feet of potential habitat during the breeding season would be directly visible at the edge of the habitat. 	<p>Less than significant (CEQA Class 3)</p> <p>FERC monitors would verify mitigation is followed.</p>	

Mitigation Monitoring Program for the North Baja Pipeline Project					
Mitigation Number a/	Impact	Significance Before Mitigation b/	Mitigation	Significance After Mitigation b/	Monitoring Responsibility
NBP35 (cont'd)			<p>c. Noise levels of construction would be controlled. Noise levels would be measured at the edge of potential habitat and results provided to the FWS to verify baseline conditions and conditions during construction activities. Noise levels would be kept at or below a day-night equivalent sound level (L_{dn}) of 60 decibels of the A-weighted scale (dBA). If the current ambient noise level exceeds an L_{dn} of 60 dBA, noise levels generated from construction activities would not exceed existing conditions.</p> <p>d. There would be no construction-related pedestrian access to any riparian habitat during breeding season except in case of emergency frac-out response and to monitor the location of the directional drill.</p> <p>e. Dust would be strictly controlled by watering construction areas within 1,000 feet of potential habitat.</p> <ul style="list-style-type: none"> • Construction or installation work performed within 1,000 feet of potential habitat for the southwestern willow flycatcher at the Colorado River crossing during the period of April 1 to September 15 would be monitored daily by a qualified biologist. Monthly monitoring letter reports of construction activities and their effects on biological resources would be provided to the BLM, the CDFG, and the FWS. 		

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number ^{a/}	Impact	Significance Before Mitigation ^{b/}	Mitigation	Significance After Mitigation ^{b/}	Monitoring Responsibility
NBP36	The open-cut crossing of Rannells Drain would directly affect about 0.04 acre of potential Yuma clapper rail habitat. Noise from construction of the pipeline and the Ehrenberg Compressor Station could indirectly affect Yuma clapper rails. Noise and activity from the operation of the Ehrenberg Compressor Station could indirectly affect the use of nearby habitats by the Yuma clapper rail (section 5.7.2.1).	Significant (CEQA Class 2)	<p>NBP would minimize the potential for impacts on the Yuma clapper rail by implementing the following measures:</p> <ul style="list-style-type: none"> • All Yuma clapper rail habitat would be avoided by adopted construction methods, except for Rannells Drain (MP 11.4). • Although there is no evidence that construction of this nature may have an adverse indirect impact on rails, the mitigation measures proposed for the southwestern willow flycatcher at the Colorado River crossing (e.g., moving the compressor station further from potential habitat and the abatement walls to be installed prior to construction) would also protect the Yuma clapper rail from any adverse impact. • At Rannells Drain, mechanical bird exclusion fencing would be installed over the habitat prior to February 1 across the entire construction area, including the needed temporary extra workspaces for the open-cut trenching of the drain. This fencing would be of sturdy construction material and of fine enough mesh to exclude Yuma clapper rails from the immediate construction work area until construction is completed to avoid direct impact on birds. NBP would maintain the bird exclusion fencing until construction starts in the habitat itself. • Construction or installation work performed within 1,000 feet of potential habitat for the Yuma clapper rail during the period of February 1 to August 30 would be monitored daily by a qualified biologist. Monthly monitoring letter reports of construction activities and their effects on biological resources would be provided to the BLM, the CDFG, and the FWS. 	Less than significant (CEQA Class 3)	FERC and CSLC monitors would verify mitigation is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP37	The project is likely to adversely affect the desert tortoise (section 5.7.2.1).	Significant (CEQA Class 2)	<p>To compensate for desert tortoise habitat affected during construction, NBP would implement the following measures:</p> <ul style="list-style-type: none"> • Impacts on desert tortoise habitat would be offset through either an acceptable land acquisition or an assessed financial contribution. Compensation rates would be determined based on the area disturbed in the BLM land categories. • NBP would provide funding to the CDFG to manage acquired lands in addition to an enhancement fee. <p>Additionally, NBP would minimize the potential for impacts on the desert tortoise by implementing the following measures:</p> <ul style="list-style-type: none"> • NBP would submit the names, permit numbers, and relevant tortoise experience resumes of all individuals who might need to handle desert tortoises to the FWS for approval at least 15 days prior to the initiation of clearance surveys. Project activities would not begin until an authorized biologist has been approved. While other biologists may be employed as monitors, only those approved by the FWS would be permitted to handle tortoises. • The FWS would provide the names of all authorized biologists to the BLM for its records. • All persons authorized by the FWS to handle desert tortoises would follow the guidelines established in the <i>Guidelines for Handling Desert Tortoises During Construction Projects</i> (Desert Tortoise Council 1994, revised 1999). • A clearance survey for the desert tortoise would be conducted by an authorized biologist within 24 hours prior to ground disturbance. • Burrows outside of the limits of the construction right-of-way would be flagged so that the biological monitor would be able to more easily locate them during construction. 	<p>Less than significant (CEQA Class 3)</p>	FERC, CSLC, and BLM monitors and the CDFG would verify mitigation is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP37 (cont'd)			<ul style="list-style-type: none"> • All desert tortoise burrows or pallets in the construction area would be excavated by a qualified biologist. All desert tortoise handling and burrow excavation would be in accordance with handling procedures developed by the FWS and conducted by qualified desert tortoise biologists. • Desert tortoises that are found above ground and need to be moved from harm's way would be placed by the authorized biologist in the shade of a shrub. All desert tortoises removed from burrows would be placed in an unoccupied burrow of approximately the same size as the one from which it was removed. • If an existing burrow is unavailable, the authorized biologist would construct or direct the construction of a burrow of similar shape, size, depth, and orientation as the original burrow. Desert tortoises moved during inactive periods would be monitored for at least 2 days after placement in the new burrows to ensure their safety. The authorized biologist would be allowed some judgment and discretion to ensure that survival of the desert tortoise is likely. • Should a tortoise wander into the construction area during construction, adjacent activities would be halted until the tortoise has been moved out of the construction work area out of harm's way. • If a tortoise is located in the construction work area and is not moving, adjacent activities would be halted until an authorized biologist is able to move it out of harm's way. • All pipeline marker signs within desert tortoise habitat would be fitted with "bird-be-gone" or similar bird repellent devices. • Only approved access roads would be used. Only approved areas would be used for temporary storage areas, laydown sites, and any other surface-disturbing activities. Any routes of travel that require construction or modification, or any additional work areas, would be surveyed for tortoises by a qualified biologist(s) prior to modification or construction of the route or construction or use of a new work area. 		

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP37 (cont'd)			<ul style="list-style-type: none"> • Trench segments or other excavations would be provided with tortoise escape ramps. All excavations would be inspected for tortoises three times daily and prior to backfilling. • Any time a vehicle is parked, the ground around and under the vehicle would be inspected for desert tortoises before the vehicle is moved. If a desert tortoise is observed, it would be left to move on its own. If this does not occur within 15 minutes, an authorized biologist would remove and relocate the tortoise. Within desert tortoise habitat, construction pipe, culverts, or similar structures with a diameter of 3 inches or greater that are stored on the construction site for one or more nights would be inspected for tortoises before the material is moved, buried, or capped. As an alternative, all such structures may be capped before being stored on the construction site. • All construction-related activities in desert tortoise habitat would be conducted from dawn until dusk. 		
NBP38	Noise from construction of the pipeline and the Ehrenberg Compressor Station could indirectly affect burrowing owls if they are present during the breeding season. Noise and activity from the operation of the Ehrenberg Compressor Station could indirectly affect the use of nearby habitats by burrowing owls (section 5.7.2.1).		<p>NBP would minimize the potential for impacts on the burrowing owl by implementing the following mitigation measures:</p> <ul style="list-style-type: none"> • Direct impacts on burrowing owl habitat would be avoided by constructing in the road pavement along 18th Avenue or boring/drilling beneath habitat areas to the maximum extent feasible. • Preconstruction surveys during the breeding season (February 1 to August 31) would be conducted by biologists who would visually check all potential habitat within 250 feet of both sides of the proposed construction work area. • Preconstruction surveys during the wintering season (September 1 to January 31) would be conducted by visually checking all potential habitat in areas where there would be some ground disturbance, including vehicle access or trenching. Qualified biologists would conduct preconstruction surveys for burrowing owls within 2 weeks of construction activities. 	<p>Less than significant (CEQA Class 3)</p> <p>FERC and CSLC monitors would verify mitigation is followed.</p>	

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP38 (cont'd)		Significant (CEQA Class 2)	<ul style="list-style-type: none"> CDFG guidelines require that one-way doors be installed at least 48 hours before construction at all active burrows within the construction work area so that the burrows are not occupied during construction activities. The one-way doors would be installed at that time to ensure that the owls can get out of the burrows but cannot get back in. CDFG guidelines also require the installation of two artificial burrows for each occupied burrow that is removed. Artificial burrows would be constructed prior to installation of one-way doors. Installation of one-way doors and construction of artificial burrows would be conducted outside of the breeding season thus avoiding any potential to affect eggs or newly hatched owls. If any active burrows are damaged by construction activities, compensation would be paid at the equivalency rate of 6.5 acres of foraging habitat for burrowing owls for each active burrow damaged. 		
NBP39	Noise from construction of the pipeline could indirectly affect LeConte's thrasher and Crissal thrasher if they are present during the breeding season. Noise and activity from the operation of the Ehrenberg Compressor Station could indirectly affect the use of nearby habitats by Crissal thrashers (section 5.7.2.1).	Significant (CEQA Class 2)	<p>NBP would minimize the potential for impacts on the LeConte's thrasher and Crissal thrasher by implementing the following measures:</p> <ul style="list-style-type: none"> Impacts on microphyll woodland habitat would be compensated through habitat acquisition (at a 3 to 1 ratio) approved by the FWS, the BLM, and the CDFG for those areas not already covered by desert tortoise habitat compensation (see NBP37). The mitigation measures proposed for the southwestern willow flycatcher at the Colorado River crossing would also protect the Crissal thrasher from any adverse impact (see NBP35). 	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify mitigation is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP40	Construction disturbances to rain pools or temporary overflow areas could disrupt breeding activities of Couch's spadefoot toad for one season (section 5.7.2.1).	Significant (CEQA Class 2)	<p>In addition to NBP's general conservation measures (see NBP34), NBP would implement the following conservation measures:</p> <ul style="list-style-type: none"> • If there are local thunderstorms that provide substantial moisture under warm conditions (temperatures over 90 degrees Fahrenheit) in July, August, or September of 2001 and in 2002, and if construction has not already been completed in that area, NBP would examine potential Couch's spadefoot toad habitat for persistent pools. The CDFG would notify NBP if appropriate conditions prevail and NBP would coordinate with the CDFG to complete surveys. • Qualified biologists would monitor temporary pools for persistence and would examine them daily for eggs, tadpoles, or toadlets. • Construction activities would not be conducted within 150 feet of temporary pools. If water fails to persist within shallow pools for 10 days, or if no Couch's spadefoot toad eggs, tadpoles, or toadlets are found within 10 days, then construction would resume in the area. • If any toads are found, the CDFG would be immediately notified. A report on the findings would be submitted to the CDFG within 30 days of completion of construction activities within the area. 	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify mitigation is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP41	Construction of the pipeline through habitat occupied by the Colorado Desert fringe-toed lizard (CFTL), flat-tailed horned lizard (FTHL), and Mojave fringe-toed lizard (MFTL) could result in direct mortality or injury of individual lizards as a result of being crushed by vehicles, movement of soil, and entrapment in open trenches. The noise and activity of construction could also indirectly impact lizards by pushing them into similar adjacent habitat further away from the construction right-of-way (section 5.7.2.1).	Significant (CEQA Class 2)	In addition to NBP's general conservation measures (see NBP34), NBP proposes to implement the following mitigation measures to minimize potential adverse impacts on the CFTL/FTHL/MFTL: <ul style="list-style-type: none"> • Qualified biologists would conduct preconstruction surveys to identify all potential habitat along the construction area. Within 7 days before construction begins, biologists would identify habitat areas subject to direct construction-related ground disturbance. • Biologists would conduct a final clearance survey 1 to 2 days prior to construction activities, excavate potential burrows, and relocate the lizards to nearby suitable habitat. The management strategy guidelines for relocation of FTHL described in the <i>Flat-tailed Horned Lizard Rangewide Management Strategy</i> (Foreman, 1997) would be used for all three species. • A field contact representative would have the authority to ensure compliance with protective measures for these lizards, and would initiate a worker education program. • A biological monitor would be present in each area of active construction within CFTL/FTHL/MFTL habitat throughout the work day from initial clearing through habitat restoration. The biological monitors would have sufficient education, field experience, and training with these lizards to understand their biology and behavior. The monitors would ensure that all activities are in compliance with the management strategy guidelines for relocation of FTHL described in the <i>Flat-tailed Horned Lizard Rangewide Management Strategy</i> (Foreman, 1997). The biological monitors would have the authority and responsibility to halt activities that are in violation of the management strategy guidelines. The monitors would: 	Less than significant (CEQA Class 3)	FERC, CSDL, and BLM monitors would verify mitigation is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project					
Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP41 (cont'd)			<p>a. examine the construction area periodically (at least hourly when surface temperatures exceed 86 degrees Fahrenheit) for the presence of CFTL/FTHL/MFTL. In addition, all hazardous sites (open pipes, trenches, holes, or deep excavations) would be inspected for the presence of lizards prior to backfilling;</p> <p>b. work with the construction supervisor to take steps, as necessary, to avoid disturbance to CFTL/FTHL/MFTL and their habitat. If avoiding disturbance is not possible or if lizards are found trapped in an excavation, the biological monitor would capture by hand and relocate the affected lizard;</p> <p>c. place relocated lizards in the shade of a large shrub a short distance from the construction right-of-way and in the direction of undisturbed habitat. If the surface temperature in the sun is less than 86 degrees Fahrenheit, or greater than 122 degrees Fahrenheit, the biological monitor authorized to handle the lizard would hold the lizard for later release; and</p> <p>d. hold initially captured CFTL/FTHL/MFTL in a cloth bag, cooler, or other appropriate clear, dry container from which the lizard cannot escape. Lizards would be held at temperatures between 77 and 95 degrees Fahrenheit and would not be exposed to direct sunlight. Release would occur as soon as possible after capture and during daylight hours when surface temperatures range from 90 to 104 degrees Fahrenheit.</p>		

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project					
Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
ARM7	Potential adverse effects on Federal and state-listed endangered and threatened species and compliance with the Endangered Species Act and California Endangered Species Act (section 5.7.3).	Significant (CEQA Class 2)	<p>NBP would not begin construction activities until:</p> <ul style="list-style-type: none"> • NBP completes all required species-specific surveys and the FERC and the CSLC receive comments from the FWS and the CDFG regarding the preconstruction survey reports; • the FERC completes formal consultation with the FWS; • the CDFG makes a consistency determination on the BO pursuant to Section 2080.1 of the California Fish and Game Code; • NBP has completed and filed with the FERC the results of consultations with the ADGF regarding measures to avoid or minimize impacts on special status species in Arizona; and • NBP has received written notification from the Director of OEP that construction or mitigation may begin. 	Less than significant (CEQA Class 3)	The FERC is responsible for providing written notification informing NBP that it can begin construction and implementation of special status species mitigation plans.
LAND USE, TRANSPORTATION, SPECIAL MANAGEMENT AREAS, RECREATION AND PUBLIC INTEREST AREAS, AND VISUAL RESOURCES					
NBP42	Land use impacts associated with the new pipeline could include disturbance of existing land uses within the construction right-of-way during construction and retention of a new permanent right-of-way for operation of the pipeline. Land used for the aboveground facilities would be permanently converted to a utility use (section 5.8.1.).	Significant (CEQA Class 2)	<p>Following construction, all land used for temporary construction right-of-way and temporary extra workspace areas would be allowed to revert to prior uses. With the exception of tree crops such as orchards, all forms of agriculture would be permitted within the permanent right-of-way. Construction of aboveground structures would be prohibited on the permanent right-of-way; however, no restriction would be placed on the temporary right-of-way or extra workspaces.</p>	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify mitigation is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP43 ARM8	Twenty-five residences and businesses could be impacted by construction and operation of the pipeline, all of which are located along 18 th Avenue. These include 18 residences and 2 businesses located within 100 feet of the construction work area. The two businesses and four of the residences would be located within 50 feet of the construction work area (section 5.8.2).	Significant (CEQA Class 2)	<p>Pipeline construction near the residential areas would be confined to the paved roadway or adjacent road shoulder of 18th Avenue. NBP has prepared and would follow site-specific residential construction mitigation plans to minimize disruption and to maintain access to the 25 residences and businesses along 18th Avenue. These plans would be revised to show safety fencing for a minimum of 100 feet on both sides of residences. In addition, NBP proposes to implement the following measures to minimize construction impacts on residences:</p> <ul style="list-style-type: none"> • minimize the amount of open trench at the end of the workday and cover or cordon off the trench during non-work hours; • secure and patrol construction areas during non-work hours to minimize safety issues associated with open trenches; • maintain an emergency ingress and egress near all residences and businesses through the construction process; • maintain one lane of restricted traffic movement through the construction area for access to residences and for emergency vehicles; • minimize noise by maintaining equipment in good operating condition; • suppress dust with the use of water trucks and regular spraying; and • temporarily relocate residents to a local motel or other lodging during construction near their homes at NBP's expense. 	Less than significant (CEQA Class 3)	FERC and CSLC monitors would very site-specific construction plans and mitigation are followed.
NBP44	Construction activities could impact traffic flow and disrupt traffic in the project area (section 5.8.3.1).	Significant (CEQA Class 2)	Major or improved roads and railroads would be crossed by boring to avoid disrupting traffic. Where open-cut road crossings are conducted, NBP would make provisions to detour or control traffic during construction. No roads would be closed for more than a short time unless adequate detours are provided.	Less than significant (CEQA Class 3)	FERC and CSLC monitors would verify mitigation is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP45 ARM9	Construction in the paved segment of 18 th Avenue could inconvenience residents and business owners (section 5.8.3.2).	Significant (CEQA Class 2)	NBP would close off 0.5- to 1-mile-long sections of road at a time, reroute traffic around these areas (while maintaining access for residents), and complete construction of the pipeline before moving onto the next section of road. All construction activities would be confined to the width of 18 th Avenue that is estimated to be about 60 feet, including the paved roadway and road shoulders. No more than 1 mile of work area would be active at any one time, unless otherwise specified by Riverside County. NBP would also prepare and file with the FERC and CSLC a Traffic Management Plan for 18 th Avenue prepared in consultation with the County of Riverside Transportation Department.	Less than significant (CEQA Class 3)	The FERC is responsible for reviewing and providing written approval of the Traffic Management Plan for 18 th Avenue. FERC and CSLC monitors would verify mitigation is followed.
NBP46	Construction activities could require plan amendments for crossing portions of designated special management areas such as the California Desert Conservation Area (CDCA) and Milpitas Wash SMA (section 5.8.4).	Significant (CEQA Class 2)	NBP has applied for an amendment to the CDCA Plan and the Yuma District Resource Management Plan, which dictate management within the CDCA and Milpitas Wash SMA, respectively. The plan amendments would not amend the majority of the decisions, goals, and objectives established in either of the plans and would only accommodate the North Baja Pipeline Project.	Less than significant (CEQA Class 3)	The BLM is responsible for issuing an amendment to the plans. FERC, CSLC, and BLM monitors would verify mitigation is followed.
NBP47	Construction activities could disrupt recreational uses at the Colorado River (section 5.8.5.2).	Significant (CEQA Class 2)	The Colorado River would be directionally drilled, which would not limit the use of the river for recreational purposes. Use of an unpaved access road to the river would be disrupted but not closed during construction of the Ehrenberg Compressor Station.	Less than significant (CEQA Class 3)	FERC and CSLC monitors would verify mitigation is followed.
NBP48	Use of the Bradshaw Trail could be disrupted for several days during construction (section 5.8.5.2).	Less than significant (CEQA Class 3)	No mitigation proposed during construction. After construction, NBP would restore the trail to its preconstruction condition.	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify the trail is returned to its preconstruction condition.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP49	Public interest areas located near the project, including the Cibola NWR, Mule Mountain Area of Critical Environmental Concern (ACEC), Pilot Knob ACEC, Palo Verde Wilderness Area, Ehrenberg Sandbowl OHV area, the Imperial Sand Dunes, and an informal camp site near the Ogilby Meter Station, could be indirectly affected by traffic, noise, and dust during pipeline construction (section 5.8.5.2)	Less than significant (CEQA Class 3)	The delivery of construction equipment and materials would not prevent access to any of the public interest areas or facilities, although recreationists may choose to use other recreational areas during pipeline construction. No other mitigation is proposed.	Less than significant (CEQA Class 3)	No monitoring required.
NBP50	The new permanent pipeline right-of-way could increase accessibility for OHV use into previously restricted, inaccessible, or environmentally sensitive areas (section 5.8.5.2).	Significant (CEQA Class 2)	NBP has stated that it has no plans to maintain an improved permanent right-of-way for operation and maintenance. However, NBP would have to maintain access to all portions of the permanent right-of-way by four-wheel drive vehicles in order to conduct emergency and periodic maintenance. NBP has also agreed to install blocking measures at intersecting road crossings. Measures would include placement of organic matter and rocks, raking the right-of-way to create a natural looking appearance, or plantings of salvaged cactus and ocotillo.	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify mitigation is followed.
NBP51	Aerial pipeline crossings and scars created by blasting could have a long-term visual impact (section 5.8.6.2).	Significant (CEQA Class 2)	NBP would chemically treat scars created by blasting where they would have a high visibility to a moderate to high number of viewers and paint the pipeline to match the surrounding landscape at all aerial crossings.	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify mitigation is followed.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP52	The aboveground facilities would have a permanent impact on visual resources (section 5.8.6.2).	Significant (CEQA Class 2)	As much as practicable, NBP has located aboveground facilities where they would be seen in the context of other manmade structures such as nearby industrial uses and high voltage electric lines or would have a limited number of viewers. Structures that would be located aboveground would be painted to blend with the surroundings.	Less than significant (CEQA Class 3)	FERC, CSLC, and BLM monitors would verify mitigation is followed.
SOCIOECONOMICS					
NBP53	Construction of the project could temporarily increase the population in the area by about 448 people. About four permanent staff would be added to handle project operations (section 5.9.2.1).	Less than significant (CEQA Class 3)	No mitigation is proposed.	Less than significant (CEQA Class 3)	No monitoring required.
NBP54	Construction-related demands on local agencies could include increased enforcement activities associated with issuing permits for vehicle load and width limits, local police assistance during construction at road crossings to facilitate traffic flow, and emergency medical services to treat injuries resulting from construction activities (section 5.9.2.3).	Significant (CEQA Class 2)	NBP would work with local firefighters and other emergency responders to coordinate activities for effective emergency response.	Less than significant (CEQA Class 3)	NBP certified adherence to this mitigation measure in its application to the FERC.
NBP55	Construction and operation of the pipeline could generate local tax revenue (section 5.9.2.5).	Beneficial Impact (CEQA Class 4)	No mitigation is proposed.	Beneficial impact (CEQA Class 4)	No monitoring required.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project					
Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
CULTURAL RESOURCES					
NBP56 ARM10	Potential adverse effects on historic properties and compliance with the National Historic Preservation Act (section 5.10.2).	Significant (CEQA Class 2)	<p>NBP would complete cultural resources surveys and reports, testing and evaluation reports, and necessary treatment plans. NBP would defer construction and use of its facilities and any staging, storage, or temporary work areas and new or to-be-improved access roads until:</p> <ul style="list-style-type: none"> • NBP prepares and files with the FERC and the CSLC, and submits to the State Historic Preservation Offices (SHPOs), the BLM, and the BOR, as appropriate, any outstanding cultural resources reports, testing and evaluation reports, and necessary treatment plans; • NBP files with the FERC and the CSLC the comments of the SHPOs, the BLM, and the BOR, as appropriate, on all cultural resources reports and plans submitted for review; • the Advisory Council on Historic Preservation has been given an opportunity to comment if required; and • the Director of OEP reviews and approves all cultural resources reports and plans, and notifies NBP in writing that construction may proceed. 	<p>Less than significant (CEQA Class 3)</p> <p>The FERC is responsible for providing written notification informing NBP that it can begin construction and implementation of necessary treatment plans.</p> <p>FERC, CSLC, and BLM monitors would verify treatment plans are followed.</p>	
AIR QUALITY AND NOISE					
NBP57	Construction of the proposed compressor station, pipeline, and meter stations could cause temporary impacts due to fugitive dust emissions, and operation of construction vehicles and equipment could result in minor temporary increases in emissions in limited areas (section 5.11.1.1).	Significant (CEQA Class 2)	<p>NBP would prepare a dust control plan identifying the active mitigation that would be used during construction to minimize the fugitive dust emissions and submit it to the Mojave Desert Air Quality Management District (AQMD) in accordance with the Mojave Desert AQMD Rule 403-2.</p>	<p>Less than significant (CEQA Class 3)</p> <p>FERC, CSLC, and BLM monitors would verify plan is followed.</p>	

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project

Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
NBP58	During operation, the emissions from the Ehrenberg Compressor Station and Ogilby Meter Station could include particulate matter less than 10 microns in diameter (PM_{10}), sulfur dioxide (SO_2), nitrogen oxides, carbon monoxide, and volatile organic compounds (section 5.11.1.1).	Significant (CEQA Class 2)	Since all emission units would burn pipeline quality natural gas, the quantity of PM_{10} and SO_2 emissions would be very small. NBP would meet all Federal, state, and local regulations regarding emission limits.	Less than significant (CEQA Class 3)	NBP certified compliance with the regulations in its application to the FERC. FERC, CSLC, and BLM monitors would verify regulations are followed.
ARM11	Noise from the Ehrenberg Compressor Station (when operated at full load) could exceed an L_{dn} of 55 dBA at any noise-sensitive area (NSA) (section 5.11.2.2).	Significant (CEQA Class 2)	NBP would conduct a noise survey to verify that the noise from the Ehrenberg Compressor Station operated at full load does not exceed an L_{dn} of 55 dBA at any NSAs, and file the results of the noise survey with the FERC and CSLC no later than 60 days after placing the compressor station in service. If the noise attributable to the operation of the compressor station at full load exceeds an L_{dn} of 55 dBA at any nearby NSAs, NBP would file a report on what changes are needed and would install additional noise controls to meet that level within 1 year of the in-service date. NBP would confirm compliance with the L_{dn} of 55 dBA requirement by filing a second noise survey with the FERC and CSLC no later than 60 days after it installs the additional noise controls.	Less than significant (CEQA Class 3)	The FERC is responsible for reviewing the results of any noise surveys and any reports on changes or noise control measures needed to meet the L_{dn} of 55 dBA limit.

TABLE 7.1-1 (cont'd)

Mitigation Monitoring Program for the North Baja Pipeline Project					
Mitigation Number <u>a/</u>	Impact	Significance Before Mitigation <u>b/</u>	Mitigation	Significance After Mitigation <u>b/</u>	Monitoring Responsibility
SAFETY AND RELIABILITY					
NBP59	The transportation of natural gas by pipeline involves some risk to the public in the event of an accident and subsequent release of gas (section 5.12).	Significant (CEQA Class 2)	The pipeline and aboveground facilities associated with the North Baja Pipeline Project would be designed, constructed, operated, and maintained in accordance with the DOT Minimum Federal Safety Standards in 49 CFR 192. NBP proposes to exceed DOT standards between MP's 0.0 and 11.7 of the pipeline route.	Less than significant (CEQA Class 3)	NBP certified compliance with the DOT Minimum Federal Safety Standards in its application to the FERC. The western region of the Office of Pipeline Safety and the Arizona Corporation Commission would verify the standards are met.

a/ NBP - North Baja Pipeline, LLC-proposed mitigation.
ARM - agency-recommended mitigation.

b/ California Environmental Quality Act (CEQA) Significance Classifications:
 Class 1 - a significant impact that cannot be mitigated to non-significance.
 Class 2 - a significant impact, but one that can be mitigated to non-significance with the application of appropriate mitigation measures.
 Class 3 - a non-significant impact.
 Class 4 - a beneficial impact.